

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Haishan Yang,

Civil No. 25-cv-00089-JMB-SGE

Plaintiff,

v.

Hannah Neprash, Scott Lanyon, JaneAnne
Murray, and Sharon Dzik, in their
individual and official capacities,

Defendants.

**PLAINTIFF'S
MEMORANDUM OF
LAW IN SUPPORT OF
MOTION FOR LEAVE TO
FILE SECOND
AMENDED COMPLAINT**

Plaintiff respectfully moves for leave to file a Second Amended Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure and Local Rule 15.1. Under Rule 15(a)(2), “the court should freely give leave when justice so requires.” Courts routinely grant such leave absent undue delay, bad faith, repeated failure to cure deficiencies, undue prejudice to the opposing party, or futility of amendment.

In this case, the proposed amendment adds new defendants and asserts an Equal Protection Clause claim based on the more added facts. The case remains in its early stages, no scheduling order or trial date has been set, and Defendants will have a full opportunity to respond to the amended pleading. There is no undue delay or prejudice. Granting leave will serve the interests of justice and promote judicial efficiency.

Date: April 27, 2025

Haishan Yang

A handwritten signature in black ink, appearing to be the Chinese characters '杨海山' (Yang Haishan).

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